

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION**

IN RE:

CASE NO. 13-05774-8-RDD

**ROANOKE TIMBERLANDS, LLC,
Debtor-in-Possession**

Chapter 11

**MOTION TO EXTEND THE TIME TO FILE
THE DISCLOSURE STATEMENT AND THE PLAN OF REORGANIZATION**

COMES NOW Roanoke Timberlands, LLC, Debtor-in-Possession in the above captioned case [hereinafter “Debtor”], by and through its undersigned counsel, and hereby moves the Court for an extension of time in which to file the Disclosure Statement and Plan of Reorganization and in support thereof shows unto the Court the following:

1. On 12 September 2013, the Debtor commenced this case by filing an emergency petition under Chapter 11 of the United States Bankruptcy Code..
2. By Order, the Court set 11 December 2013 as the deadline for the filing the disclosure statement and plan of reorganization.
3. However, the Debtor is not prepared to file a plan at this time. The Debtor has discussed a sales process with a national marketing firm and the needs to get that accomplished. It has forwarded this information to the lender for review. The lender has been evaluating this option through its own resources but has not reported to the Debtor its conclusions. The Debtor wishes to receive the lenders feedback before filing its Plan to not waste unnecessary delay.
4. The Debtor believes that a short extension will allow the Debtor to file its Plan with the lender’s consent or concerns in mind.

WHEREFORE, the Debtor respectfully requests the Court to enter an Order extending the time for filing the disclosure statement and plan until 18 December 2013.

Respectfully submitted this 11th day of November 2013.

J.M. Cook, P.A.

By: /s/ J.M. Cook

J.M. Cook

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CERTIFICATE OF SERVICE

I, J.M. Cook, of 5886 Faringdon Place, Suite 100, Raleigh, North Carolina, 27609, certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this day, I served copies of the foregoing Motion electronically upon the Bankruptcy Administrator, other counsel of record appearing on the docket and upon the Debtor by mailing, postage prepaid, first class mail, addressed as follows:

Roanoke Timberlands, LLC
Attn: William Thorne, Manager
P.O. Box 405
Biddle, MT 59314

I certify under penalty of perjury that the foregoing is true and correct.

This 11th day of November 2013.

J.M. Cook, P.A.

By: /s/ J.M. Cook

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